

Washington, DC 20219

March 14, 2017

Supervisory Condition Letter #2017-03 September 2017

Wolf von Durckheim Assistant Vice President USAA Federal Savings Bank 10750 McDermott Frwy San Antonio, Texas 78288

Subject: Request on behalf of USAA Federal Savings Bank to Waive Certain Reporting for its 2017 Dodd-Frank Act Stress Test (DFAST) Submission.

Dear Mr. Durckheim:

This letter is in response to your request dated March 14, 2017, for OCC to extend to USAA Federal Savings Bank (USAA) the same reduced reporting treatment for DFAST 14A in 2017 as is allowed for subsidiaries of large, noncomplex firms as defined by the Federal Reserve Board. As discussed below, the OCC has determined that a waiver is appropriate.

Discussion

Based on the fact that USAA meets the definition, other than being a subsidiary of a Savings and Loan Holding Company, the OCC determines that to require the additional sub-schedules is not appropriate in light of the bank's noncomplex business model. OCC will not require USAA to include in its OCC Reporting Form for DFAST 14A for 2017 the various sub-schedules that subsidiaries of other large, noncomplex firms are no longer required to report.

If you have any questions concerning this matter, please contact Examiner-in-Charge Dallas A. Nobles at (202) 286-2976.

Sincerely,

/s Dallas A. Nobles Examiner-in-Charge Midsize Bank Supervision